

November 30, 1983

Note to Dan McDonald

SUBJECT: TURKEY POINT 3 - TERRESTRIAL, BIOLOGICAL & PHYSICAL MONITORING
PROGRAMS (OELD # 839 450)

In addition to Mitzi Young's note (attached), I have an additional comment. The safety conclusion on the bottom of the impact statement is inadequate. First, I don't like us issuing an amendments, even on a purely environmental one, that does not have a safety evaluation associated with it. You should have some sort of safety evaluation. To tuck a safety conclusion at the end of an impact statement without any indication in the title that it is also the safety conclusion isn't sufficient. I would change the title of that document to "Safety Evaluation and Environmental Impact Appraisal".

In addition to that, you need more for the safety conclusion than simply the boiler plate. It now says "based on the foregoing" you reach a safety conclusion. But the foregoing is purely an environmental impact analysis. There is no discussion of safety at all up top. A few sentences is all you need. In fact, the proposed notice of no significant hazards consideration gave at least some basis. It says there was no change in the safety of the plant - that's a good statement. Its not a matter of "based on the foregoing", its a statement by you as a safety PM familiar with the safety of the plant that there are no changes in plant safety. That's a good complete statement and that's the basis for a conclusion that there is reasonable assurance that the plant can be operated without endangering.

for *AmB*
Joe Scinto

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